

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: MI WINDOWS AND DOORS, INC.  
PRODUCTS LIABILITY LITIGATION

MDL No. 2333  
Case No. 2:12-mn-0001-DCN

Hon. David C. Norton

STATE OF OREGON                     )  
  ) ss.:  
COUNTY OF WASHINGTON         )

**Affidavit of Shawn M. Schneider Regarding Claims Filed and Forms Downloaded**

SHAWN SCHNEIDER, upon his oath, deposes and says:

1. I am a Project Manager for Epiq Systems (“Epiq”) and responsible for management of Epiq’s work related to *In re: MI Windows and Doors Inc. Product Liability Litigation*, currently pending before the District Court for South Carolina, Case No. 12-mn-00001 (the “Action” or “Settlement”). I make this Affidavit based on my personal knowledge and information available through the records and employees of Epiq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct. If called upon to testify, I could and would testify consistently herewith.

2. Epiq was established in 1968 as a client services and data processing company. Epiq has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 1,000 settlements of complex cases, including some of the largest and most complex cases ever settled. Epiq’s class action case administration services include coordination of all notice requirements,

design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service (“USPS”), notice website development and maintenance, dedicated phone lines with recorded information and/or live operators, receipt and processing of opt-outs, claims database management, claim adjudication, funds management, and award calculations and distribution services. Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement settlement administration services based on the negotiated terms of a settlement.

3. Epiq was chosen by the Parties to this Action, and appointed by the Court, to administer all aspects of the notice and claims process of the Settlement.

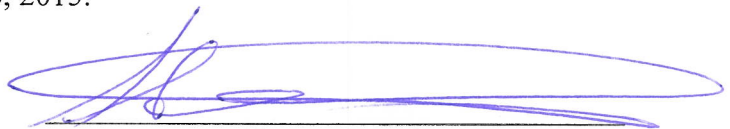
4. On April 1, 2015, a neutral, informational, website was established ([www.MIWDTapeGlazedWindowSettlement.com](http://www.MIWDTapeGlazedWindowSettlement.com)) to enable potential Settlement Class Members to file a claim and to obtain additional information and documents including the Detailed Notice in English and Spanish, the Settlement Agreement, the Homeowner and Contractor Claim Forms and answers to frequently asked questions. As of June 28, 2015, [www.miwdtapeglazedwindowsettlement.com](http://www.miwdtapeglazedwindowsettlement.com) has had 366,760 sessions in which users actively engaged with the website for a total of 507,516 page views.

5. As part of the claims process, Claimants may submit claims by mail, by email or online at [www.miwdtapeglazedwindowsettlement.com](http://www.miwdtapeglazedwindowsettlement.com). Between April 1, 2015 and June 28, 2015, Epiq has received 704 claim submissions. Another 604 people have entered their contact information in the online claim filing module found on the website, but have not completed a claim submission. Of the 704 claims submitted during this time frame, 702 are identified as Homeowner Claim Forms and 2 are identified as Contractor Construction Claim Forms.

6. Between April 1, 2015 and June 28, 2015, 2,364 copies of the Homeowner Claim Forms and 85 copies of the Contractor Construction Claim Forms have been downloaded from [www.miwdtapeglazedwindowsettlement.com](http://www.miwdtapeglazedwindowsettlement.com).

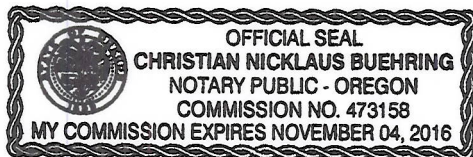
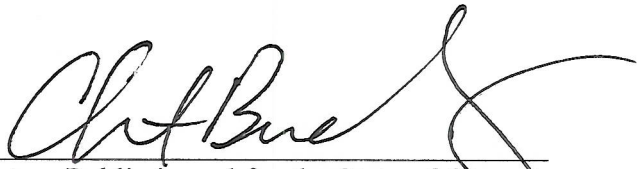
7. Epiq established a toll-free number (1-888-668-8198) on April 1, 2015, allowing Class Members to call and request that a Detailed Notice and a Homeowner Claim Form or a Contractor Claim Form be mailed to them. The toll-free number also provides Class Members with access to recorded information that includes answers to frequently-asked questions and directs them to the case website. Callers may also choose to speak to a live operator during regular business hours who can address further questions. This automated phone system is available 24 hours per day, 7 days per week. As of June 28, 2015, the toll-free number has handled 4,973 calls representing 35,137 minutes of use with 3,796 live operator conversations totaling 32,335 minutes of use.

8. Homeowners may submit claims on or before October 26, 2015 for prior repairs and December 28, 2015 for existing conditions. Contractor Construction Claim Forms may be submitted up to and including October 26, 2015.



Shawn M. Schneider

SUBSCRIBED and SWORN to before me this 29<sup>th</sup> day of June, 2015.

Notary Public in and for the State of Oregon

My Commission Expires: November 4, 2016